

# **Exhibit**

# **A**

## Richard Goldwasser

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**From:** Alexander Burke [aburke@burkelawllc.com]  
**Sent:** Friday, January 03, 2014 12:02 PM  
**To:** Adam J. Glazer  
**Cc:** Norm Finkel  
**Subject:** RE: Martin v. JTH Tax

Adam,

Following up on these two follow up questions:

1. Please disclose all third parties that made calls on behalf of Liberty during the class period; and
2. Provide names and addresses for these companies (the address previously provided for Zee Calls, LLC is a residential address in a Coop building).

We will withdraw the motion once we receive complete information.

Alex

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**From:** Alexander Burke [mailto:[aburke@burkelawllc.com](mailto:aburke@burkelawllc.com)]  
**Sent:** Monday, December 30, 2013 1:43 PM  
**To:** 'Adam J. Glazer'  
**Cc:** 'Norm Finkel'  
**Subject:** RE: Martin v. JTH Tax

Adam,

Also, is this the address on the documentation your client has? Please confirm.

While I see that it is the address that the New York Secretary of State has, the address is a residential Coop building. Appears to be a non-current address.

Alex

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1/3/2014

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**From:** Adam J. Glazer [<mailto:adam.glazer@sfnr.com>]  
**Sent:** Friday, December 27, 2013 5:58 PM  
**To:** Alexander Burke  
**Cc:** Norm Finkel  
**Subject:** RE: Martin v. JTH Tax

I can do no more than tell you that this is who we interacted with. As mentioned, the rest will have to come from them.

As we have agreed, please confirm the withdrawal. Thank you.

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**From:** Alexander Burke [<mailto:aburke@burkelawllc.com>]  
**Sent:** Friday, December 27, 2013 5:52 PM  
**To:** Adam J. Glazer  
**Cc:** Norm Finkel  
**Subject:** Re: Martin v. JTH Tax

Please confirm that this is the entity with the call data.

Alex Burke

Burke Law Offices, LLC  
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(312) 729-5288  
[ABurke@BurkeLawLLC.com](mailto:ABurke@BurkeLawLLC.com)  
(Sent from my handheld)

On Dec 27, 2013, at 5:29 PM, "Adam J. Glazer" <[adam.glazer@sfnr.com](mailto:adam.glazer@sfnr.com)> wrote:

The vendor my client used is:

Zee Calls LLC  
220 Pelham Road 2L  
New Rochelle, NY 10805

Please confirm the withdrawal of your motion next week. Thank you.

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**From:** Alexander Burke [<mailto:aburke@burkelawllc.com>]  
**Sent:** Friday, December 27, 2013 5:19 PM  
**To:** Adam J. Glazer  
**Cc:** Norm Finkel  
**Subject:** Re: Martin v. JTH Tax

I suppose all you can do is tell me what you know. But I would have expected that you would know the information requested, based upon our conversations over the past two

months and your assurance that nothing has been destroyed.

Please provide what you know and I will withdraw the motion without prejudice.

Alex Burke

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(312) 729-5288  
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(Sent from my handheld)

On Dec 27, 2013, at 5:15 PM, "Adam J. Glazer" <[adam.glazer@sfnr.com](mailto:adam.glazer@sfnr.com)> wrote:

All that we have is the vendor's contact information. Any inquiries about formats would have to be addressed to the vendor.

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**From:** Alexander Burke [<mailto:aburke@burkelawllc.com>]

**Sent:** Friday, December 27, 2013 5:00 PM

**To:** Adam J. Glazer

**Cc:** Norm Finkel

**Subject:** Re: Martin v. JTH Tax

If you produce everything requested in the motion we will withdraw the motion without prejudice.

Alex Burke

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(312) 729-5288  
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(Sent from my handheld)

On Dec 27, 2013, at 4:47 PM, "Adam J. Glazer" <[adam.glazer@sfnr.com](mailto:adam.glazer@sfnr.com)> wrote:

Alex: We have now had the opportunity to review your motion and discuss it internally. The holiday spirit apparently prevails. While we believe we are under no obligation to supplement, if we are willing to do so and furnish the name and address of the 3d-party vendor, are you prepared to withdraw your motion? We should each make efforts to avoid burdening the court with this dispute. Please advise.

Thanks,

**Adam J. Glazer**

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